

EXHIBIT E

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

KASHIF ALLEYNE, DERRICK LOUIGARDE, and DAMANI
MCFARLANE,

Plaintiffs,

-against-

CITY OF NEW YORK, JOHN and JANE DOE 1 through 10,
individually and in their official capacities (the names John and
Jane Doe being fictitious, as the true names are presently
unknown),

Defendants.

**DEFENDANT'S FIRST
SUPPLEMENTAL
DISCLOSURES
PURSUANT TO F.R.C.P.
26(e)**

15 CV 01860 (WFK)(VMS)

Defendant City of New York, by its attorney, Zachary W. Carter, Corporation
Counsel of the City of New York, pursuant to Rule 26(e) of the Federal Rules of Civil
Procedure, hereby submits the following for its first supplemental disclosures:

(a)(1)(A)(i). the name and, if known, the address and telephone number of each
individual likely to have discoverable information—along with the subjects of that
information—that the disclosing party may use to support its claims or defenses, unless
solely for impeachment;

9. Detective Ylka Morales, Shield No. 05340, Brooklyn North Narcotics, 1
Police Plaza, New York, NY;
10. Detective Natia Kalandadze, Shield No. 20858, Brooklyn North Narcotics,
1 Police Plaza, New York, NY;
11. Detective James McCullough, Shield No. 31112, Brooklyn North
Narcotics, 1 Police Plaza, New York, NY;
12. Detective Lorne Kanover, Shield No. 01824, Brooklyn North Narcotics, 1
Police Plaza, New York, NY.

Dated: New York, New York
August 12, 2015

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
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By:



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Special Federal Litigation Division

To: Via First Class Mail
Robert Marinelli, Esq.
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